

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**TODD TARGGART, et al.,**

Plaintiffs,

v.

**NEXT BRDGE HYDROCARBONS,  
INC., et al.,**

Defendants.

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**No. 4:24-cv-00767-P**

**DEFENDANT JOHN BRDA’S  
MOTION TO DISMISS PLAINTIFFS’ AMENDED COMPLAINT**

Defendant John Brda files this motion to dismiss Plaintiffs’ Amended Complaint (ECF No. 41) for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6). Pursuant to Local Rule 7.1(d), the grounds for Mr. Brda’s motion to dismiss are fully set forth in his contemporaneously filed brief in support of this motion. In short, dismissal is appropriate because (1) Plaintiffs lack statutory standing to bring a claim under Section 12(a)(2) of the Securities Act; (2) Plaintiffs fail to plausibly allege that Mr. Brda is a “statutory seller”; and (3) the one-year statute of limitations bars Plaintiffs’ Section 12(a)(2) claim against Mr. Brda.

WHEREFORE, Defendant Brda respectfully requests that the Court dismiss the Section 12(a)(2) claim against him with prejudice and award such other and further relief as the Court deems just and proper.

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Dated: October 23, 2024.

Respectfully submitted,

/s/ Jason M. Hopkins

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***ATTORNEYS FOR DEFENDANT***

***JOHN BRDA***

**CERTIFICATE OF SERVICE**

I certify that I served the foregoing motion on all counsel of record via the Court's CM/ECF system on October 23, 2024.

/s/ Jason M. Hopkins

Jason M. Hopkins